



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

December 13, 2010

Ms. Gay Vietzke
Superintendent
National Park Service
Hampton National Historic Site
535 Hampton Lane
Townson, Maryland 21286-1397

Re: Hampton National Historic Site, Draft General Management Plan and Environmental Impact Statement, Townson, Maryland (CEQ #20100403)

Dear Ms. Vietzke:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1509), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan and Environmental Impact Statement for the Hampton National Historic Site in Townson, Maryland.

The purpose and need for the Draft General Management Plan/Environmental Impact Statement (GMP/EIS) is to provide a clear definition of the park's purpose, significance, fundamental resources and values, and the direction that will guide and coordinate all subsequent planning and management for 15 to 20 years into the future.

The Hampton National Historic Site (Hampton NHS) is a 62-acre unit of the National Park System. The area is of national significance as it is an example of Georgian architecture and landscape design. In addition, the American Revolution, establishment of a new economy, slavery, the Civil War, Emancipation and Reconstruction are reflected by the site's cultural resources. The site is a comprehensive assemblage of structures, landscapes, collections and archives, preserved by one family over ten generations. The Hampton NHS represents an unusually complete chronicle that reveals the daily activities of the Ridgely family, laborers and enslaved persons, and illustrates 18th and 19th century history and design.

To achieve the purpose and desired future conditions of the Hampton NHS, the NPS evaluated three alternatives: Alternative 1—No Action Alternative, Alternative 2—Experiencing the Past; and Alternative 3—Broadening the Hampton Experience (Preferred Alternative). Alternatives 2 and 3 differ in the approach to the visitor experience, the extent of landscape rehabilitation and the use of buildings that would be proposed. The NPS has designed



Alternative 3 as the environmentally preferred alternative. Alternative 3 recommends a more limited rehabilitation of the formal garden, west field and ornamental plantings and would rely on multiple approaches to experience the Ridgely estate. The primary historic buildings would be interpreted, but others would be rehabilitated to accommodate collections, administration and visitor services

EPA understands that the GMP is a programmatic document where impacts are addressed in general terms and recognizes that the EIS serves as a basis for the preparation of more in-depth NEPA documents to assess subsequent developments or management actions. However, because the DEIS does not have pertinent information to fully assess environmental impacts, EPA rated the document an EC-2 (Environmental Concerns/Insufficient Information) which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of this project. A copy of EPA's ranking system is enclosed for your information.

EPA developed comments and questions which are presented in the Technical Comments (enclosure). Of particular concern are impacts to wetlands and threatened and endangered species as well as protection to human health from exposure to radon.

Thank you for providing EPA with the opportunity to review this project. We look forward to reviewing the FEIS and future/tiered environmental documents. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Enclosure (4)



Technical Comments

Radon

As noted on page 27 under “Health,” levels of radon in the mansion basement are a potential risk to employee and visitor health. Installation of a venting system proved inadequate; therefore, no use is proposed for the basement that would necessitate people spending extended periods of time in this space. The FEIS should include locations and dates of radon samples collected and sample results. Additional information, including how long the ventilation system operated and the sampling or monitoring that has occurred, should be documented. The FEIS should discuss whether adjoining area to the basement were sampled, and if the additional sampling was performed, the results of the sampling, to identify if there is any risk to human health elsewhere in the house. It is recommended that data be collected to determine if continued operation of ventilation could reduce radon levels or if other radon mitigation methods should be sought to lower the hazardous levels of radon in the basement. While remediation is underway, restriction and notification of risk should be publicly displayed to alert workers and the public of exposure to radon in the basement.

Cultural Resources

Page 49, Table 2-3: List of Major Projects by Alternative notes the construction of mansion side visitor contact station for Alternative 3 (Preferred Alternative). It is not clear if the visitor contact station would have an impact on the integrity of the historic mansion. Page 43 states that a mansion side small visitor contact station would be located in the Support Zone. Therefore it is assumed that the small visitor contact station is away from the mansion. Distance/proximity of the small visitor contact station should be defined in relation to the mansion. Please explain in the Final EIS.

The size and configuration of the historic and support zones for Alternatives 1, 2 and 3 vary. The Support Zone for Alternative 3 (Preferred Alternative) is largest in comparison with the other alternatives. In addition, it is assumed that the protected Historic Zone is reduced for Alternative 3 (Preferred Alternative). Please explain in the Final EIS how the zones were derived, why the larger support zone is needed for Alternative 3 (Preferred Alternative) and if there is a difference in protection of resources for the designated Historic Zone and Support Zone.

Wetlands

Page 68 states, “Baltimore County floodplain maps and the U.S. Fish and Wildlife Service’s National Wetlands Inventory (1981) show no floodplains or wetlands identified within the park boundaries.” Because the maps referenced are close to 30 years old, it would seem prudent to do a current wetlands inventory. This is also warranted since the DEIS references areas that may be classified as wetlands. For instance, page 68 notes that a band of hydric soil and hydrophytic vegetation extends along the banks of the dairy stream, the western border of the mansion site, and the far southern boundary of the park in the wooded area next to the I-695



noise wall. The vegetation associated with this area should be identified and delineated because of the possible presence of wetlands. The text states, “The narrow strips of palustrine forested, broad-leaved deciduous wetlands along the dairy stream banks are similar to those found in two streams near the park, one about 800 feet east of Hampton’s boundary adjacent to an unnamed tributary to Loch Raven Reservoir, and the other about 800 feet west of the park boundary along Hampton Branch.”

Similarly, page 98 states that there “...is a small stream system emanating from the spring inside the dairy. The stream runs 442 feet from the dairy eastward to a concrete enclosed culvert. Its banks include narrow bands of palustrine forested, broad-leaved deciduous riparian wetland areas (no greater than 10-12 feet at the eastern boundary). This stream is approximately 3 feet in width with an approximately 50 foot riparian buffer, and only minimal floodplain is directly associated with it.”

It is important to note that Wetlands present on, or immediately surrounding the site should be delineated according to the 1987 Federal Manual for Identifying and Delineating Jurisdictional Wetlands. Impacts to wetlands should be avoided or minimized whenever possible. The total size of the wetlands should be provided, in addition to the size of the wetland in the study area and size of the direct impact. The FEIS must analyze the size and functional values of all impacted wetlands and develop a mitigation plan for their replacement.

Vegetation/Threatened and Endangered Species

Page 68 states, “A total of 823 native and exotic trees and shrubs have been identified by park staff as important elements of the site’s designed landscape.” Is there a descriptive list that breaks down the 823 native and exotic trees as well as identifies threatened and endangered species to be included as an appendix in the FEIS?

The Endangered Species Act (ESA) provides for the listing of endangered and threatened species of plants and animals as well as the designation of critical habitat for listed species. The ESA prohibits the taking of any listed species without (for federal agencies) an “Incidental Take Statement.” The definition of “taking” includes injury and harassment. The ESA also requires federal agencies to exercise their authorities, in consultation with designated agencies (in effect, the U.S. Fish and Wildlife Service and National Marine Fisheries Services, as appropriate), to conserve endangered species. It further requires federal agencies to consult with these agencies on any action that may jeopardize the continued existence of any threatened or endangered species, which has been interpreted by regulation to require consultation for any action that “may affect” such species. For actions that may adversely affect species, the regulatory agencies may recommend mitigation. Such mitigation is required if an agency action would otherwise jeopardize the species existence, and it may be required if agency action will result in a take and, therefore, require an incidental take authorization. The FEIS should provide a description of terrestrial, wildlife and aquatic species in the study area. Any threatened or endangered species must be listed. Critical habitat for threatened or endangered species should be properly identified. The FEIS should describe the potential impacts to these species from the proposed action.



The DEIS states that the proposed actions for Hampton NHS will not alter the existing habitat or negatively impact wildlife within the boundaries of the park. It also states that the wildlife in the park is common to the area. However, designated agencies of authority should be notified of the proposed action and given the opportunity to evaluate and assess for potential impacts.

The most recent state and federal threatened and endangered species coordination letters should be included in the FEIS. In addition, we recommend that the appropriate state and federal agencies be contacted annually at a minimum regarding these issues.

Invasive Species

As noted on page 102, removal of invasive exotic plants is intended. The FEIS (or future NEPA documentation) should identify and quantify the invasive exotic plants to be removed as well as the plan for this action.

Invasive species effects on water resources can be direct, as in the case of many aquatic nuisance species, or indirect, as in terrestrial species that change water tables, runoff dynamics, fire frequency, and other watershed attributes that in turn can alter water body conditions. Indirect social/behavioral effects of invasive species can result in significant water quality impacts as well; for example, fear of non-native pests may prompt more pesticide and herbicide use, potentially increasing the amount of these chemicals entering water bodies through runoff. Both terrestrial and aquatic invasive species can be harmful to our waters – some affect the water directly, while other species affect the land in ways that harm the water. The threat of invasive species should be evaluated and mitigation measures addressed.

Low Impact Development

EPA understands that the GMP is a programmatic document; therefore the impacts are addressed in general terms. However, EPA would like to see the following comment addressed in future NEPA documentation.

Page 84 states, “There would still be short-term, minor negative impacts from ground disturbance and materials storage during construction and long-term, minor to moderate negative impacts from the intrusion of the relocated parking lots, roads and pathways into the cultural landscape.” The DEIS does not estimate the ground disturbance, size of parking lots, roads and pathways needed. In future environmental documentation, EPA would like to see an estimate of ground disturbance and impervious surface to result from the proposed action as well as the location of proposed actions to fully assess impacts.

EPA appreciates and encourages the NPS to pursue sensitive site design, screening and the use of environmentally sustainable materials selection to limit impacts from the proposed action. A Presidential Memorandum (dated April 26, 1994) and Guidance (dated August 10, 1995) applicable to Federal facilities and federally funded projects pertinent to environmentally and economically beneficial landscape practices is to be incorporated into all NEPA-related documents. As outlined in Executive Order 13148 dated April 26, 2000 (Federal Register Vol.



65, No. 81) on Greening the Government, it has been directed that all agencies incorporate the above Guidance into landscape programs, policies and practices. The Guidance calls for agencies that fund and landscape to provide recipients with information of beneficial landscaping as well as to work to support and encourage application of the principles. The EPA, GSA and USDA are tasked with providing technical information on beneficial landscaping to other federal agencies and their facilities. The effort, also recognized as low impact development, has the potential to reduce impacts on watershed hydrology and aquatic resources. This is described in the enclosure provided.

Energy Efficiency

This project presents an excellent opportunity for the NPS to implement the President's Executive Order 13423-- *Strengthening Federal Environmental, Energy, and Transportation Management* by incorporating energy efficiency into the retrofit and/or construction efforts for the Hampton NHS as well as Executive Order 13514--*Federal Leadership in Environmental, Energy, and Economic Performance*. Enclosed is information that EPA recommends the NPS consider in the retrofit/construction phase of the proposed action.

Distribution List

The DEIS should have included a Distribution List of agencies, organizations, and persons to whom copies of the document were sent as indicated in 40 CFR §1502.10 under "Recommended format: and §1502.19. A Distribution List identifies those parties who have been given the opportunity to comment and reveals that those not included on the list may need to be given the DEIS for review. This information is critical to ensuring all necessary parties are given the opportunity to review and provide input to the impacts of the proposed action. Since this list was not included in the DEIS, please provide it in the FEIS.

Miscellaneous

In the Table of Contents, the spelling of "Vegetation" should be corrected and the referenced page should be changed from page 102 to page 101.

